

FILED  
U.S. DISTRICT COURT  
DISTRICT OF NEW MEXICO

IN THE UNITED STATES DISTRICT COURT 2014 JAN 15 PM 4:59

FOR THE DISTRICT OF NEW MEXICO CLERK-LAS CRUCES

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	CRIMINAL NO. <u>13-CR-3670 RB</u>
	)	
vs.	)	Count 1: 21 U.S.C. § 846: Conspiracy;
	)	
<b>JOVITA BELMONTE-GONZALEZ,</b>	)	Count 2: 21 U.S.C. §§ 841(a)(1) and
<b>a.k.a. "Corina,"</b>	)	(b)(1)(C): Possession With Intent to
<b>CELENA MARQUEZ,</b>	)	Distribute Heroin; 18 U.S.C. § 2: Aiding
<b>ANDY NUÑEZ,</b>	)	and Abetting;
<b>KATHYE YOUNG,</b>	)	
<b>JEREMY SPARKS, and</b>	)	Counts 3-4: 18 U.S.C. §§ 922(g)(1) and
<b>JORGE CARILLO,</b>	)	924(a)(2): Felon in Possession of a Firearm.
	)	
Defendants.	)	

SUPERSEDING INDICTMENT

The Grand Jury charges:

Count 1

From on or about June 20, 2013, and continuing to on or about October 15, 2013, in Doña Ana County, in the District of New Mexico, and elsewhere, the defendants, **JOVITA BELMONTE-GONZALEZ, a.k.a. "Corina," CELENA MARQUEZ, ANDY NUÑEZ, KATHYE YOUNG, JEREMY SPARKS, and JORGE CARILLO,** unlawfully, knowingly and intentionally combined, conspired, confederated and agreed with each other and with other persons whose names are known and unknown to the Grand Jury to commit an offense against the United States, specifically, distribution of 100 grams and more of a mixture and substance containing a detectable amount of heroin, contrary to 21 U.S.C. §§ 841(a)(1) and (b)(1)(B).

Overt Acts

In furtherance of the conspiracy and to effect the objects thereof, the following overt acts, among others, were committed in the District of New Mexico, and elsewhere:

Overt Act One

On June 20, 2013, Jorge Carillo facilitated Celena Marquez purchasing 50 grams of heroin from Jovita Belmonte-Gonzalez for \$1400 in Ciudad Juarez, Chihuahua, Mexico, after which Marquez transported the heroin into the United States.

Overt Act Two

On September 19, 2013, through September 21, 2013, Celena Marquez apologized to Jovita Belmonte-Gonzalez for not providing the full amount of money that Celena Marquez owed to Jovita Belmonte-Gonzalez for a prior drug debt and arranged to send Kathye Young to Mexico to purchase 100 grams of heroin from Jovita Belmonte-Gonzalez.

Overt Act Three

On September 21, 2013, Celena Marquez and Jeremy Sparks facilitated Kathye Young purchasing 100 grams of heroin from Jovita Belmonte-Gonzalez in Ciudad Juarez, Chihuahua, Mexico, and then transporting the heroin into the United States.

Overt Act Four

On September 26, 2013, Andy Nuñez exchanged text messages with Jovita Belmonte-Gonzales in which he arranged for Celena Marquez to purchase 100 grams of heroin from Jovita Belmonte-Gonzalez in Ciudad Juarez, Chihuahua, Mexico, the following day.

Overt Act Five

On September 27, 2013, Celena Marquez sent Kathye Young and another female to Ciudad Juarez, Chihuahua, Mexico, to purchase 100 grams of heroin from Jovita Belmonte-Gonzalez.

Overt Act Six

On October 15, 2013, Celena Marquez arranged for Kathye Young to purchase 100 grams of heroin from Jovita Belmonte-Gonzalez in Ciudad Juarez, Chihuahua, Mexico.

Overt Act Seven

On October 15, 2013, Andy Nuñez drove Kathye Young to the international border, where Kathye Young crossed into Mexico and purchased 100 grams of heroin from Jovita Belmonte-Gonzalez before transporting the heroin into the United States.

In violation of 21 U.S.C. § 846.

Count 2

On or about October 15, 2013, in Doña Ana County, in the District of New Mexico, the defendant, **KATHYE YOUNG**, unlawfully, knowingly and intentionally possessed with intent to distribute a controlled substance, a mixture and substance containing a detectable amount of heroin.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(C), and 18 U.S.C. § 2.

Count 3

On or about June 27, 2013, in Doña Ana County, in the District of New Mexico, the defendant, **JORGE CARILLO**, having been convicted of the following felony crimes punishable by imprisonment for a term exceeding one year:

(1) residential burglary, and

(2) unlawful taking of a motor vehicle,

knowingly possessed, in and affecting commerce, a firearm:

(1) a High-Point, Model C9, 9 mm handgun, serial number P1376560.

In violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(2).

Count 4

On or about November 15, 2013, in Doña Ana County, in the District of New Mexico, the defendant, **JORGE CARILLO**, having been convicted of the following felony crimes punishable by imprisonment for a term exceeding one year:

- (1) residential burglary, and
- (2) unlawful taking of a motor vehicle,

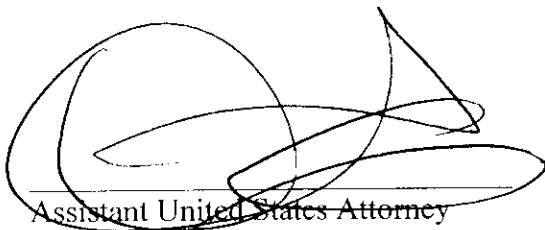
knowingly possessed, in and affecting commerce, a firearm:

- (1) a Remington 870, 12-gauge shotgun, serial number C034541M.

In violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(2).

A TRUE BILL:

LS/  
FOREPERSON OF THE GRAND JURY

  
Assistant United States Attorney  
RC 01/10/14 1:54PM